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23 Attorneys for Plaintiff

24 **UNITED STATES DISTRICT COURT**  
25 **DISTRICT OF NEVADA**

26 NAVAJO HEALTH FOUNDATION – SAGE  
27 MEMORIAL HOSPITAL, INC. (doing  
28 business as “Sage Memorial Hospital”); an  
Arizona non-profit corporation,

Plaintiff,

vs.

RAZAGHI DEVELOPMENT COMPANY,  
LLC; a Nevada limited liability company  
(doing business as “Razaghi Healthcare”),  
AHMAD R. RAZAGHI; individually, TAUSIF  
HASAN; individually, DOES 1-10;

Defendants.

Case No. 2:19-cv-0329-GMN-EJY

**JOINT STIPULATION TO EXTEND  
TIME FOR PLAINTIFF TO FILE AN  
AMENDED COMPLAINT**

**(FIRST REQUEST)**

Pursuant to Federal Rule of Civil Procedure 6(b)(1) and the Court's Local Rule of Civil Practice 7-2, Plaintiff (Navajo Health Foundation – Sage Memorial Hospital, Inc.) and Defendants (Razaghi Development Company, LLC, Ahmad Razaghi and Tausif Hasan) stipulate and agree to permit Plaintiff an additional 30-days, or to and until May 5, 2021, to file an Amended Complaint. This is the parties first request for an extension of time for the purpose set forth herein. The parties respectfully request the Court approve this stipulation and in support of this request rely upon the following facts:

1. By Order filed March 15, 2021 the Court permitted Plaintiff to file “an Amended Complaint curing the deficiencies” identified in its 34-page Order. *See* ECF 128, p. 34. Currently, Plaintiff's Amended Complaint is due on or before April 5, 2021.

2. Counsel for Plaintiff has communicated with defense counsel regarding this matter and expressed the need for additional time in order address the deficiencies identified by the Court while at the same time balancing competing case commitments. Further, counsel for Plaintiff will need this additional time to verify certain facts for inclusion in the Amended Complaint. All of the foregoing will require additional time beyond the current deadline.

3. Counsel for Defendants do not have any issue with Plaintiff being granted an additional 30-days, or until May 5, 2021, to file an Amended Complaint. The parties agree that good cause supports this request.

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1 In light of the foregoing, the parties respectfully request that the Court approve this  
2 stipulation.

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4 /s/ Kris Leonhardt

/s/ Paul S. Padda

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6 Pavneet S. Uppal, Esq.

Kathleen Bliss, Esq.

Kris Leonhardt, Esq.

Paul S. Padda, Esq.

7 Brian L. Bradford, Esq

David Stander, Esq.

Douglass A. Mitchell, Esq.

8 *Counsel for all named Defendants*

*Counsel for Christi El-Meligi,  
Netrishia Dalgai and Navajo Health  
Foundation – Sage Memorial  
Hospital, Inc.*

9 Dated: March 31, 2021

Dated: March 31, 2020

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14 **IT IS SO ORDERED:**

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17 **UNITED STATES MAGISTRATE JUDGE**

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19 **DATED: March 31, 2021**  
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